

Oct 12 2021

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

**CRIMINAL COVER SHEET**

**Instructions:** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

**CASE NAME:**

USA v. Kealeon Shakur Dyer-Hogan

**CASE NUMBER:**

CR 21-396 JD

**Is This Case Under Seal?**Yes  No **Total Number of Defendants:**1  2-7  8 or more **Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**Yes  No **Venue (Per Crim. L.R. 18-1):**SF  OAK  SJ **Is this a potential high-cost case?**Yes  No **Is any defendant charged with a death-penalty-eligible crime?**Yes  No **Is this a RICO Act gang case?**Yes  No **Assigned AUSA (Lead Attorney):** Leif Dauthch**Date Submitted:** 10/12/2021**Comments:**

This case is related to a pending criminal case that is already assigned to Judge Chesney United States v. Dyer-Hogan, 19-cr-554-MMC.

**FILED**

1 STEPHANIE M. HINDS (CABN 154284)  
 2 Acting United States Attorney  
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Oct 12 2021

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 8 CLERK, U.S. DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO  
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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	) CASE NO. CR21-396 JD
Plaintiff,	) VIOLATIONS:
v.	) 18 U.S.C. § 1591(a), (b)(2) – Sex Trafficking of
KEALEON SHAKUR DYER-HOGAN,	) Children
Defendant.	) 18 U.S.C. § 1594(d)(1) – Forfeiture Allegation
	) SAN FRANCISCO VENUE

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INFORMATION

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 1591(a)(1), (b)(2) – Sex Trafficking of Children)

Between on or about July 3, 2021 and on or about July 22, 2021, in the Northern District of California, the defendant,

KEALEON SHAKUR DYER-HOGAN,

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, and maintain a person, known here as Minor Victim 4, after having a reasonable opportunity to observe Minor Victim 4, knowing and in reckless disregard of the fact that Minor Victim 4 had not attained the age of eighteen years, and knowing and in reckless disregard of the fact that Minor Victim 4 would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections

1 1591(a)(1) and (b)(2).

3 FORFEITURE ALLEGATION: (18 U.S.C. § 1594(d)(1))

4 The allegations contained above are re-alleged and incorporated by reference for the purpose of  
5 alleging forfeiture pursuant to Title 18, United States Code, Section 1594 (d)(1).

6 Upon conviction of the offense set forth in Count One, the defendant,

7 KEALEON SHAKUR DYER-HOGAN,

8 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d)(1), any  
9 property, real or personal, that was used or intended to be used to commit or to facilitate the commission  
10 of the violation described in Count One, including but not limited to a forfeiture money judgement and  
11 the following property:

- 12 a. One Alcatel Android cell phone with IMEI 015727000611492 and assigned call  
13 number 831-707-6880;
- 14 b. One Apple iPhone with IMEI 353218105808630, and assigned call number 510-776-  
15 3810; and
- 16 c. One Hyundai Tucson vehicle with California license plate 5TJA035.

17 If any of the property described above, as a result of any act or omission of the defendant:

- 18 a. cannot be located upon exercise of due diligence;
- 19 b. has been transferred or sold to, or deposited with, a third party;
- 20 c. has been placed beyond the jurisdiction of the court;
- 21 d. has been substantially diminished in value; or
- 22 e. has been commingled with other property which cannot be divided without  
23 difficulty,

24 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
25 United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)  
26 and Title 28, United States Code, Section 2461(c).

1 All pursuant to Title 18, United States Code, Section 1594(d)(1), and Federal Rule of Criminal  
2 Procedure 32.2.

3  
4 DATED: October 12, 2021

STEPHANIE M. HINDS  
Acting United States Attorney

5  
6 */s Leif Dautch* \_\_\_\_\_  
7 LEIF DAUTCH  
Assistant United States Attorney

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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY:  COMPLAINT  INFORMATION  INDICTMENT SUPERSEDING**OFFENSE CHARGED**

Count One: 18 U.S.C. § 1591(a), (b)(2) – Sex Trafficking of Children

- Petty  
 Minor  
 Misdemeanor  
 Felony

PENALTY: Maximum penalties: lifetime imprisonment with 10-year mandatory minimum; lifetime supervised release with 5-year minimum term; \$250,000 fine; \$100 special assessment; restitution; forfeiture.

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI

 person is awaiting trial in another Federal or State Court, give name of court this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District this is a reprocution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY  DEFENSESHOW DOCKET NO.  
} this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underMAGISTRATE CASE NO.  
}

Name and Office of Person Furnishing Information on this form STEPHANIE M. HINDS

 U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Leif Dauth

**PROCESS:** SUMMONS  NO PROCESS\*  WARRANT

If Summons, complete following:

 Arraignment  Initial Appearance

Defendant Address:

Bail Amount: \_\_\_\_\_

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

Kealeon Shakur Dyer-Hogan

**DISTRICT COURT NUMBER**

CR21-396 JD

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1)  If not detained give date any prior summons was served on above charges2)  Is a fugitive3)  Is on bond**FILED**

Oct 12 2021

**IS IN CUSTODY**4)  On this date5)  On another date6)  Awaiting trial on other chargesCLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

If answer to (6) is "Yes", show name of institution

Santa Rita Jail

Has detainer  Yes  
been filed?  NoIf "Yes"  
give date  
filedDATE OF  
ARRESTMonth/Day/Year  
July 22, 2021

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

 This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS**